

REMARKS/ARGUMENTS

Claims 1-30 are pending. Claims 19-26 are withdrawn from consideration. By this Amendment, claim 1 is amended and claims 29 and 30 are added. Reconsideration in view of the above amendments and the following remarks are respectfully requested.

Claims 1-15, 17 and 18 were rejected under 35 U.S.C. §103(a) over Dubuit (U.S. Patent No. 6,397,740), in view of Rodi (U.S. Patent No. 6,019,046). This rejection is respectfully traversed.

At the outset, Applicant notes that the previous rejection of February 6, 2008 included various rejections based on the combination of Dubuit and Rodi. In response to those rejections, Applicant provided various traversals and/or amendments to the claims. However, Applicant has received no response to his traversals. For example, Applicant's July 7, 2008 response clarifies that claim 1 is a "means-plus-function" claim, which requires the Examiner to treat it based on MPEP 2182-2183. There is no acknowledgement in the Office Action that claim 1 is a "means-plus-function" claim, and nor has the Office Action made the requisite analysis under PTO guidelines to reject this claim.

Moreover, the Office Action does not satisfy the requirements of 37 CFR §1.104(c)(2), which requires the Examiner to provide detailed specifics as to the parts of the references that he employs in formulating the rejection. For example, the Examiner refers to "the entire Rodi pa[t]ent for details" in supporting the rejection. See page 3, second full paragraph (last line) of the Office Action.

As a final preliminary matter, Applicant has amended claim 1 to clarify that the term "it" refers to the mobile printing bridge. This amendment is made for clarity only, and is specifically

in response to the July 31, 2008 Advisory Action in which it was alleged that this term was unclear.

Turning now to the merits of the rejection, Applicant again refers to the traversal laid out in the July 7, 2008 Amendment After Final Rejection.

As alluded to above, the Examiner has failed to follow the guidelines set forth in MPEP §§2182-2183, which requires the Examiner to interpret an MPF limitation consistent with the specification, and to apply a two-step analysis in considering such MPF limitations: 1) define the particular function of the limitation, and 2) identify the corresponding structure for that function. In the present case, the Examiner has failed to establish a *prima facie* case for rejecting the MPF claim limitations recited in claim 1.

As acknowledged in the Office Action, Dubuit does not teach to transform or convert the same mobile printing bridge from a screen printing station to a digital printing station, or vice versa, as recited in claim 1.

To make up for the deficiency, the Office Action relies on the teachings of Rodi. In the Office Action, the Examiner merely refers to printing units 4a-4e, without specifying any corresponding text supporting this rejection. The Examiner simply refers to Rodi's entire patent for details.

However, as specified in Applicant's previous response, Rodi teaches that any kind of printing units 4a-4e and any kind of aggregate units 9a-9c could be mounted indifferently in each of the positions on the printing machine. This is clear evidence of the fact that these units have a different structure to one another and therefore Rodi does not teach to replace a single component such as a printing bridge of a first unit and a second unit to change the printing mode of the second unit (e.g., from the printing mode made available by the unit 4a to the printing

mode of units 4b-4e). The different structure of each of the units must be taken into account because offset and gravure printing units have rotating cylinders to be controlled, while electrophotographic and inkjet printing units do not have rotating cylinders to be controlled. Therefore, Applicant respectfully submits that, starting from Dubuit as the most relevant prior art, the teaching of Rodi (at best) suggests to one of ordinary skill in the art to modify the printing machine of Dubuit by replacing one or more screen printing stations 14 in its entirety with one or more corresponding ink jet printing stations 5, or vice versa.

In addition, the Dubuit/Rodi combination does not teach or suggest the subject matter of the dependent claims.

For example, claim 2 specifies that the means to install the assemblies for screen printing or digital application comprises at least one pair of supporting elements to mount on the mobile printing bridge at least one doctor/doctor unit or at least one doctor/scrapper unit of an assembly for applying one or more substances in screen printing mode, and to mount at least a bar to support a plurality of heads for applying one or more substances in digital mode.

According to the Office Action, Dubuit teaches the same means to install the assemblies for screen printing or digital application. According to the Examiner, these teachings can be found at column 2, lines 62-67 as follows:

"In the case of the screen printing station 14, suffice it to say that it conventionally employs a screen constituting a stencil, some meshes of which are open and others of which are blocked, depending on the pattern to be printed, and that the screen is associated with a mobile squeegee adapted to force ink through the open mesh."

This is simply a generic description of a screen printing station and does not include any teaching about the subject matter of claim 2. It should be noted that the "mobile squeegee" cited

by Dubuit corresponds to the claimed doctor/doctor unit or doctor/scrapper. According to the present application, the “mobile squeegee” can be replaced by the bar for supporting the digital printing heads; the so-called mobile printing bridges mounted on the pair of supporting elements constitute the components that can be replaced in the same station in order to convert the station from screen to digital printing mode (or vice versa).

Moreover, Applicant respectfully submits that the Examiner’s statement that Rodi suggest to replace the printing bridge only is in error. In other words, Applicant fails to appreciate how it is possible to mount a fixed unit including printing rollers (offset and gravure printing units have rotating rollers) on the same movable supports for a mobile squeegee. Therefore, Applicant respectfully submits that this is further evidence that Rodi suggests to replace the whole station, instead of a single component, in order to change the printing mode in each position of the printing machine.

The Office Action further cites the description of Dubuit at column 3, lines 28-40 in the context of the rejection of claim 2. This section reads as follows:

“In the embodiment shown, the screenprinting station 14 with which the digital printing station 15 is associated is mobile between an in-service position which is relatively close to the endless conveyor 11 and in which it is able to operate (FIG. 1) and a standby position which is relatively far away from the endless conveyor 11 and in which there is a sufficient gap 16 between it and the conveyor for the digital printing station 15 to be substituted for it (FIGS. 4a and 4b).

In the embodiment shown, the screenprinting station 14 in practice slides on at least one column 18 substantially perpendicular to the endless conveyor 11. As shown here, for example, there are two parallel spaced columns 18.”

By contrast, the present patent application discloses a machine in which the printing stations are fixed and only the printing bridges are movable during printing in a direction parallel to the substrate to be printed. After considering Rodi, Applicant respectfully submits that it is

highly dubious that a unit with printing rollers can be mounted on the same movable supports used for digital printing.

As a further observation of the text cited by the Examiner, Dubuit and Rodi suggest and practice the same solution, i.e., that of replacing whole stations instead of a single component. In other words, Dubuit teaches to replace the screenprinting stations 14 by lifting the same and bringing the digital printing station 15 into the operative position, close to the conveyor, and previously occupied by the printing station 14.

Applicant also notes that in regard to the rejection of claim 8, the Examiner seems to suggest that Dubuit discloses the claimed subject matter. In particular, the Office Action specifies that Dubuit comprises at least one station for applying one or more substances according to claim 1. However, the Examiner previously indicated that Dubuit does not teach or suggest transforming or converting the same mobile printing bridge from a screenprinting station to a digital printing station, or vice versa, as recited in claim 1.

In regard to the rejection of claim 10, the Examiner states that Dubuit discloses a fixed printing bridge 20. However, these are only rails supporting the whole digital printing station (see column 3, lines 46-50). Claim 10 specifies that at least one of the stations is set for digital application of said one or more substances and comprises at least one fixed printing bridge which extends perpendicularly in relation to the progress direction of the substrate. In other words, the digital printing bridge is held fixed in the same position during printing and the substrate to be printed is moved below the bridge. However, as known by those of ordinary skill in the art, the printing edge must be periodically cleaned; when this operation takes place, the printing is temporarily stopped, the bridge is then moved to the cleaning position, where suitable devices

are provided for this purpose, and finally moved back in the original position before restarting the printing.

Reconsideration and withdrawal of the rejection are respectfully requested.

Claim 16 was rejected under 35 U.S.C. §103 over Dubuit in view of Rodi, and further in view of EPO 687560. This rejection is respectfully traversed at least for the reason that claim 16 depends from claim 8, which in turn depends from claim 1, and is patentable by virtue of that dependency, in addition to the further features recited in claim 16 in combination with claims 1 and 8.

Reconsideration and withdrawal of the rejection are respectfully requested.

Claim 27 was rejected under 35 U.S.C. §103(a) over Dubuit in view of Rodi, and further in view of Terrazas et al. (U.S. Patent No. 3,842,738). This rejection is respectfully traversed.

Claim 27 is directed to a machine for applying substances to a substrate comprising a plurality of application stations arranged along a common production line, at least one unit for general control of said machine and a unit to sequentially transfer said substrate from one of said stations to another of said stations, at least one of said stations being convertible from a screen printing mode to a digital printing mode, or vice versa, said at least one station including at least one common movable support to support both a doctor/scrapper assembly when in the screen printing mode and a digital printing assembly when in the digital printing mode.

In the Office Action, the Examiner admits that the combination of Dubuit/Rodi does not teach a mobile printing bridge including at least one common frame having at least one common movable support for use in both the digital mode and the silk screen mode.

To make up for this deficiency, the Office Action relies on the teachings of Terrazas et al. According to the Examiner, Terrazas et al. teaches the concept of using at least one common

movable support. However, the Examiner identifies fixed frame members 12, 14, 15a, 15b, 16a, 16b. However, none of these members are movable, as claimed.

Reconsideration and withdrawal of the rejection are respectfully requested.

Claim 28 was rejected under 35 U.S.C. §103(a) over Dubuit in view of Terrazas et al. This rejection is respectfully traversed.

Claim 28 is directed to a machine for applying substances to a substrate comprising a plurality of application stations arranged along a common production line, at least one unit for general control of said machine and a unit to sequentially transfer said substrate from one of said stations to another of said stations, at least one of said stations being convertible from a screen printing mode to a digital printing mode, or vice versa, said at least one station including at least one common movable support to support both a doctor/scrapper assembly when in the screen printing mode and a digital printing assembly when in the digital printing mode.

Again, the Examiner acknowledges that Dubuit does not teach that the one station includes at least one common movable support to support both a doctor/scrapper assembly when in the screenprinting mode and a digital printing assembly when in the digital printing mode. The Examiner relies on the teachings of Terrazas et al. to show at least one common movable support. However, frame members 12, 14, 15a, 15b, 16a and 16b are fixed elements, not movable and thus do not constitute at least one common movable support.

In addition, Dubuit does not teach to convert the screenprinting station to a digital printing station, as previously admitted in the Office Action in relation to the rejection of claim 1. Terrazas et al. does not teach any movable support for the two different kind of printing systems and also the portion of the description cited by the Examiner is silent about movable

members. In any event, Terrazas et al. teaches to replace printing units provided with rollers, and therefore, fixed on the frame of the printing press.

Reconsideration and withdrawal of the rejection are respectfully requested.

In view of the above amendments and remarks, Applicant respectfully submits that all the claims are patentable and that the entire application is in condition for allowance.

The Commissioner is hereby authorized to charge any deficiency, or credit any overpayment, in the fee(s) filed, or asserted to be filed, or which should have been filed herewith (or with any paper hereafter filed in this application by this firm) to our Account No. 14-1140 under Order No. PTB-3687-99.

Should the Examiner believe that anything further is desirable to place the application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: /Paul T. Bowen/
Paul T. Bowen
Reg. No. 38,009

PTB:jck
901 North Glebe Road, 11th Floor
Arlington, VA 22203-1808
Telephone: (703) 816-4000
Facsimile: (703) 816-4100